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Via ECF

May 17, 2011

Hon. Frederic Block, U.S.D.J.
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Case No.: 11-cv-02256 (FB)(ALC)
Abax, Incorporated v. Carpenters Pension Fund
MLLG File No: 74-2011

Dear Judge Block:

This law firm represents Abax Inc., the Petitioner in the above-referenced matter

I am in receipt of an e-mail from your Case Manager, Mike Innelli, requesting that Petitioner file a letter stating whether or not Petitioner anticipates the necessity for discovery and therefore, whether a a Rule 16 conference should be scheduled. Depending on Respondents' response to the Petition, it may be necessary to conduct discovery. Therefore, we respectfully request that the Court schedule a Rule 16 conference. In the event that a Rule 16 conference is no longer necessary after Respondents respond to the Petition, we will inform the Court of same.

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen